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Attorneys for Plaintiff
South Seattle Auto Auction

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

In re:

INCREDIBLE AUTO SALES, LLC,

Debtor.

Case No. 06-60855

Adversary No. 06-00120

MANHEIM SERVICES CORPORATION
d/b/a SOUTH SEATTLE AUTO
AUCTION,

Plaintiff,

INCREDIBLE AUTO SALES, LLC,

Defendant.

**MOTION FOR APPROVAL OF
STIPULATION AND TO VACATE
PRELIMINARY INJUNCTION
HEARING**

COMES NOW Plaintiff, South Seattle Auto Auction ("Auction"), by and through its undersigned counsel, and moves this Court for an order approving the attached stipulation ("Stipulation"), *attached hereto as Exhibit "A" and incorporated herein by reference*, entered into between Auction, Debtor/Defendant, and creditor Hyundai Motor Finance Company that provides for Auction's requested relief without the need for a

preliminary injunction hearing, and to vacate the preliminary injunction hearing set for November 6, 2006 at 2:00 o'clock p.m.

Since the agreement reached does not require an injunction bond, the Court's order should also release the bond which was filed in accordance with the Court's order dated October 26, 2006.

For the Court's convenience, a proposed order has been provided contemporaneously with the instant motion.

WHEREFORE, Auction respectfully requests that the Court enter an order which:

1. Approves the Stipulation and orders that the parties to said Stipulation be bound to perform under its terms;
2. Vacates the preliminary injunction hearing set for November 6, 2006 at 2:00 o'clock p.m.; and
3. Grants such and other further relief as the Court deems just and equitable.

DATED this 6th day of November, 2006.

/s/ Christopher Birkle
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CERTIFICATE OF SERVICE

I hereby certify that, on October __, 2006, a copy of the foregoing document was served on the following persons by the following means:

1, 2, 3 CM/ECF

_____ Hand Delivery

_____ Mail

_____ Overnight Delivery Service

_____ Fax

1, 2, 3 E-mail

1. William L. Needler
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/s/ Christopher P. Birkle
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